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July 2, 2021

The Hon. Sanket J. Bulsara, U.S.M.J. Theodore Roosevelt U.S. Courthouse 225 Cadman Plaza East Brooklyn, NY 11201

Vladov et al. v. Nabiullina, No. 20-cv-4633-RRM-SJB Re:

Dear Magistrate Judge Bulsara,

My office represents the plaintiff Igor Vladov in this action. Mr. Vladov and Ms. Nabiullina have a minor child in common. The complaint that was filed in this action by plaintiff's prior counsel inadvertently references the child by her full name and date of birth, which is contrary to Fed.R.Civ.P. 5.1 allowing only to reference a child by her initials and birth year.

The parties hereby jointly request that the complaint be sealed, and the plaintiff be permitted to file a redacted pleading in its stead.

Thank you for your time and consideration of this matter.

Respectfully,

Timur Zubaydullin, Esq.

Attorney for Defendant

Natalia Gourari

Attorney for Plaintiff

Igor Vladov